

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: WAYNE C. HALAJA and TERRY M. HALAJA, Debtor, THE MONEY SOURCE, INC., Movant, v. WAYNE C. HALAJA, TERRY M. HALAJA and RONDA J. WINNECOUR, Trustee Respondent	Bankruptcy No. 19-23668-CMB Chapter 13 Doc. No. 59
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**THE MONEY SOURCE, INC.'S RESPONSE TO TRUSTEE'S MOTION TO PRECLUDE
POSTPETITION MORTGAGE FEES, EXPENSES AND CHARGES**

AND NOW, comes The Money Source, Inc. ("TMS"), files this response to the Trustee's Motion to Preclude Post-petition Mortgage Fees, Expenses and Charges:

1. Admitted.
2. Admitted.
3. Denied. By the way of further response, TMS is without sufficient information as to the truth of the matter asserted. Strict proof is demanded thereof.
4. Denied. By the way of further response, TMS is without sufficient information as to the truth of the matter asserted. Strict proof is demanded thereof.
5. Admitted.
6. Denied. By the way of further response, TMS is without sufficient information as to the truth of the matter asserted. Strict proof is demanded thereof.
7. Denied. By the way of further response, the averment of paragraph eight (8) is a conclusion of law to which no response is required thereof.

8. Denied. By the way of further response, TMS is without sufficient information as to the truth of the matter asserted. Strict proof is demanded thereof.
9. Denied. By the way of further response, TMS is without sufficient information as to the truth of the matter asserted. Strict proof is demanded thereof.
10. Denied. By the way of further response, TMS is without sufficient information as to the truth of the matter asserted. Strict proof is demanded thereof. Additionally, TMS will concede to the denial of the notice of post-petition expenses and is in the process of filing a notice of withdrawal. Additionally, TMS prior to the hearing will provide the required proof to the trustee regarding removal of the fees from the mortgage loan.
11. Denied. By the way of further response, the averment of paragraph eleven (11) is a conclusion of law to which no response is required thereof.

WHEREFORE, The Money Source, Inc, hereby respectfully requests that this Honorable Court grant Debtor's Motion to Preclude Post-petition Mortgage Fees, Expenses and Charges.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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Dated: September 2, 2021